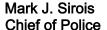
EAST HARTFORD POLICE DEPARTMENT







Melody A. Currey Mayor

TO: Federal Communications Commission

FROM: Jeffrey Vannais

PSAP Representative, Connecticut Enhanced 9-1-1 Commission Communications Supervisor, East Hartford Police Department

DATE: February 14, 2008

SUBJECT: Uninitialized phones

I have been communicating for some time with others in the emergency communications field on the issue of non-initialized cellular phones. Many of us agree across the country that the order issued by the FCC on December 1, 1997 that mandates that wireless carriers must process 9-1-1 calls from uninitialized phones has caused a serious problem for the public safety community. Every dispatch center employee I talk to tells stories of how their center has been involved in dispatching public safety resources to countless false calls.

At the APCO Conference in 2002, I asked a question of the members of the FCC Regulatory Panel that is gathered each year at this conference- here is the reference in the 9-1-1 dispatch notes for the conference that were published on the Internet:

"An audience member asked if the FCC might revisit the issue of uninitialized wireless phones. The panelists noted that they just issued rules to require a distinctive phone number to be transmitted to the PSAP. However, the FCC would rather deal with the bad consequences of uninitialized phones rather than turning them off completely. They also noted receiving a letter from a public safety agency asking for clarification: can a carrier cut off an uninitialized phone if a PSAP reports that it's being used to harass?"

The panel members never answered either question.

In 2006 I asked if we could use the form developed by the Tennessee Emergency Telecommunications Board to attempt to gather information from our 107 PSAP's regarding calls from uninitialized phones. I received some responses via e-mail, others by phone, and due to other work considerations did not have time to follow up. In our own personal experience in East Hartford, we have dealt with a myriad of these calls from time to time. Many of them are simply hang-ups that are untraceable. This does cause another problem from a management standpoint. Our dispatchers are used to

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closure- they receive a call for help, and they send the help. They have completed their mission, and then move on. With these calls from uninitialized phones, there is always the question of whether or not it was actually someone calling for help that they could not reach. Other calls, though, made by people who know they can't be traced or found, are made to report false incidents. We had a youngster from our Middle School making calls every afternoon when he arrived home from school. He would report structure fires, robberies, and other serious incidents, always at an address that was close enough to where he lived so he could see the responding units. We know this because we were finally able to catch him- only because he bragged to his friends about what he was doing.

The request in the petition is to have the ability to block harassing calls. I believe that this does not go far enough. Wireless carriers had offered to take care of the groups that have been championed as being the logical recipients of these phones- battered women, elderly citizens. We should ask them again if they are still willing. If so, at least we would be giving these people phones that can be called if need be, and traced on our Phase II maps. Hopefully, then we could convince all of you that the real solution is to turn these phones off completely. If you stop paying the bill for your wireline phone, you lose dial tone. Cell phones should be no different.